

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**DONALD WAYNE GOOD**

**vs.**

**THE CITY OF IRVING, TEXAS,  
IRVING POLICE DEPARTMENT,  
CHIEF OF POLICE FOR THE CITY  
OF IRVING AND FRED CURTIS**

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**CIVIL ACTION NO. 3-06CV2133-K**

**STIPULATION OF DISMISSAL**

Pursuant to Fed.R.Civ.P. 41(a)(1), **DONALD WAYNE GOOD**, the Plaintiff herein, does hereby stipulate that he is dismissing with prejudice all claims he has asserted herein, or could have asserted herein, against Defendants **FRED CURTIS A/K/A FREDERICK A. CURTIS, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY; the CHIEF OF POLICE OF THE CITY OF IRVING, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY; the CITY OF IRVING POLICE DEPARTMENT; and the CITY OF IRVING**, and that all costs of court, expenses of any nature and attorney's fees shall be paid by the party incurring same. Further, he requests that the Court sign the Agreed Order of Dismissal with Prejudice which is being forwarded to it contemporaneously with this Stipulation.

Respectfully submitted,

/s/ Mark Werbner

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**DONALD WAYNE GOOD**

**AGREED TO:**

/s/ Paul K. Pearce, Jr.

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**THE CITY OF IRVING, TEXAS,**

**IRVING POLICE DEPARTMENT,**

**CHIEF OF POLICE FOR THE CITY**

**OF IRVING AND FRED CURTIS**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2011, I electronically filed the foregoing document with the clerk of the Court for the Northern District of Texas, Dallas Division, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorney of record who has consented in writing to accept this Notice as service of this document by electronic means: Mr. Sean S. Modjarrad, MODJARRAD & ABUSSAD LAW FIRM, 100 N. Central Expressway, Suite 1000, Richardson, Texas 75080, and Mark Werbner, SAYLES WERBNER, P.C., 1201 Elm St., Suite 4400, Dallas, TX 75270.

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/s/ Paul K. Pearce, Jr.

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**PAUL K. PEARCE, JR.**